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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

JUL 06 2009

John A. Clarke, Executive Officer/Clerk
By Glorietta Robinson, Deputy
GLORIETTA ROBINSON

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**

12 SAM LUTFI, an individual,

13 Plaintiff,

14 vs.

15 LYNNE IRENE SPEARS, an individual;
16 JAMES PARNELL SPEARS, an individual;
BRITNEY JEAN SPEARS, an individual; and
17 DOES 1 through 25, inclusive,

18 Defendants.

Case No: BC 406904

**DECLARATION OF SAM LUTFI IN
SUPPORT OF OPPOSITION TO
DEFENDANT LYNNE SPEARS'
MOTION TO STRIKE PURSUANT TO
ANTI-SLAPP STATUTE**

[Opposition to Motion to Strike Pursuant to
Statute; Declarations of Adnan Ghalib, Alli
Sims, Robin Johnson and Filipe Teixeira,
Request for Judicial Notice and Evidentiary
Objections filed concurrently herewith]

Date: July 23, 2009

Time: 8:30 a.m.

Place: Dept. 23

Action filed: February 3, 2009

Trial date: March 8, 2010

Assigned for all purposes to Judge Zaven V.
Sinanian, Dept. 23

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1 I, Sam Lutfi, do hereby declare:

2 1. I am over the age of eighteen and the plaintiff in the action entitled Lutfi v.
3 Spears, et al., LASC Case No. 406904.

4 2. As to the following facts, I know them to be true of my own knowledge. If called
5 upon to testify, I would and could testify competently to the facts set forth herein.

6 3. I first met Britney Spears ("Britney") in early 2007 at a Los Angeles area
7 nightclub.

8 4. During the months that followed our first meeting, Britney telephoned me on
9 numerous occasions and sent me hundreds of text messages. As a result of our conversations and
10 messages, a friendship developed between me and Britney. In fact, our friendship grew so strong
11 that Britney often sought my advice and counsel in connection with almost every important
12 decision in her life including, without limitation, the ongoing divorce proceedings and custody
13 battle with Kevin Federline, the ongoing feud between Britney and her family, as well as her
14 new album.

15 5. In or about September 2007, at Britney's request, I accompanied her to a meeting
16 with record company executives to discuss production and release of her new album,
17 "*Blackout*". At this meeting, the record company executives were initially reluctant to discuss
18 details concerning "*Blackout*" in front of me. However, Britney unilaterally informed them that
19 I was her new "manager" and authorized to discuss "*Blackout*" with them. In the days that
20 followed, Britney repeatedly asked and urged me to take on the role of her "manager".
21 Ultimately, out of a concern for Britney and her well being, I agreed to do so.

22 6. During the course of my relationship with Britney, I had the opportunity to meet
23 the members of Britney's family including, without limitation, Lynne Spears ("Lynne") and
24 Jamie Spears ("Jamie"). Because of the ongoing feud between Britney and her family, my
25 relationship with Lynne and Jamie was always strained, as they falsely believed that I stood in
26 between them and their daughter.

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1 7. On February 1, 2008, Jamie, as the conservator for Britney, brought an *ex parte*
2 application for a Temporary Restraining Order (the "TRO") seeking to prevent me from having
3 any further contact with Britney. The *ex parte* application was supported, in part, by a
4 declaration from Lynne.

5 8. Although a permanent restraining order was never issued by the Court in
6 connection with that TRO, the TRO had the effect of terminating my relationship with Britney.
7 Consequently, from that point forward I was not seen with Britney in public and I did not attend
8 any meetings or other public events with her.

9 9. In the months following the TRO, I lived a relatively normal, quiet and private
10 life, far away from the press and media that typically surrounds Britney and free from public
11 scrutiny, hatred, contempt, ridicule and obloquy.

12 10. In or about September 2008, I first became aware that Lynne published a book
13 entitled, "*Through the Storm, A Real Story of Fame and Family in a Tabloid World*" (the
14 "Book"), that included numerous defamatory and libelous claims against me.

15 11. Immediately after I became aware of the Book's publication, I began receiving
16 numerous threatening letters and death threats. When I went out in public, I constantly was
17 harassed and cajoled by the public. In fact, it became virtually impossible for me to be seen
18 anywhere in public without someone yelling insults and racial slurs at me, spitting at me and
19 calling me names.

20 12. As a result of the Book, and the public scorn I have been subjected to as a result
21 thereof, I am constantly in fear for my life and safety and the life and safety of my friends and
22 family. I have been subjected to cruel and unusual criticism, name calling and racial slurs. As a
23 result of the foregoing, I am also unable to get a good night's sleep and have been forced to seek
24 counseling to help me cope with these issues.

25 13. Prior to the Book's publication, I had been involved in the music and
26 entertainment industry as a talent manager.

27 14. Since the Book was published, however, and as a direct result therefrom, I have
28 been unable to secure employment in the music and entertainment industry resulting in a

1 substantial loss of potential income.

2 15. In her Book, Lynne states that I told her that I threw away all of Britney's phone
3 chargers and disabled the house phones by cutting the wires. In fact, I never threw any of
4 Britney's phone chargers or disabled any house phone by cutting the wires, nor did I ever make
5 any such statement to Lynne.

6 16. In her Book, Lynne states that I told her and Jackie Butcher ("Jackie") to tell
7 Britney that Adnan Ghalib is gay. I never made any such statement to Jackie or Lynne.

8 17. In her Book, Lynne states that I told her and Jackie that I secretly grind up
9 Britney's pills and put them in her food; that Britney had been drugged and asleep for three days;
10 and that Britney's doctor was trying to get her into a sleep-induced coma so that he could then
11 give Britney other drugs. I never made any such statements to Jackie and Lynne.

12 18. In her Book, Lynne claims that I disabled several of Britney's cars so she couldn't
13 leave her house unattended. I have never disabled, or even attempted to disable, any of Britney's
14 cars.

15 I hereby declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct.

17 Executed this 3rd day of July 2009, at Los Angeles, California.

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Sam Lutfi

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PROOF OF SERVICE

STATE OF CALIFORNIA]
]ss.
COUNTY OF LOS ANGELES]

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 1901 Avenue of the Stars, Suite 500, Los Angeles, California 90067.

On **July 6, 2009**, I served the following document(s) described as:

***DECLARATION OF SAM LUTFI IN SUPPORT OF OPPOSITION TO
DEFENDANT LYNNE SPEARS' MOTION TO STRIKE PURSUANT TO ANTI-SLAPP
STATUTE***

on the interested parties in this action as follows:

☒ **STATE**

☐ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. from **(310) 201-0045** to _____. The transmission was reported as complete and without error, and a transmission report was properly issued by the transmitting facsimile machine.

☐ by placing a true copy of the document(s) listed above in a sealed envelope(s), with postage thereon fully prepaid, addressed as set forth below. I am readily familiar with the firm's practice for collection and processing of correspondence and other materials for mailing with the United States Postal Service. On this date, I sealed the envelope(s) containing the above materials and placed the envelope(s) for collection and mailing at the address above following our office's ordinary business practices. The envelope(s) will be deposited with the United States Postal Service on this date, in the ordinary course of business.

☒ by placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill and causing the envelope to be delivered to a Federal Express agent for next business day delivery to the address(es) listed below.

PLEASE SEE THE ATTACHED SERVICE LIST.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this Proof of Service was executed on **July 6, 2009** at Los Angeles, California.



Yumi Pick

SERVICE LIST

LUTFI v. SPEARS, ET AL.

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